

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **WESTERN DISTRICT OF WASHINGTON**  
3                                   **SEATTLE DIVISION**

4                   SECURITIES AND EXCHANGE COMMISSION,

5                                   Plaintiff,

6                   v.

7                   ISHAN WAHI, NIKHIL WAHI, and SAMEER  
8                   RAMANI,

9                                   Defendants.

Civil Action No. 2:22-cv-1009

MOTION FOR LEAVE TO FILE  
OVER-LENGTH MOTION FOR  
ENTRY OF DEFAULT  
JUDGMENT

NOTE ON MOTION  
CALENDAR: JANUARY 16,  
2024

11           Pursuant to Local Rule 7(f), Plaintiff Securities and Exchange Commission (“SEC”)  
12 respectfully requests leave to file a Motion for Entry of Default Judgment as to Sameer Ramani  
13 (“Motion”) that exceeds the word and page limits set by Local Rule 7(e)(1). The SEC’s  
14 forthcoming Motion will need to address at least two space-intensive topics. First, the SEC will  
15 have to establish that the factors set out in *Eitel v. McCool*, 782 F.2d 1470, 1471-72 (9th Cir. 1986))  
16 entitle it to a default judgment. Two of those seven factors require the SEC to show that it has  
17 established the elements of insider trading and that the relevant crypto assets are securities under  
18 *SEC v. W.J. Howey Co.*, 328 U.S. 293, 299 (1946), both of which require detailed multi-pronged  
19 analyses. Second, the SEC’s Motion will address the bases for its requests for relief, including  
20 injunctions, disgorgement, and civil penalties, which will also occupy a significant number of  
21 pages.

22           The SEC therefore respectfully requests that it be permitted to file a Motion of no more than  
23 35 pages.

Respectfully submitted,

/s/ Peter Lallas

Daniel Maher

Peter Lallas

(Conditionally Admitted Under LR 83.1)

Securities and Exchange Commission

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